

# Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 2

## COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6<sup>th</sup> February to noon on Tuesday 2<sup>nd</sup> April 2024. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

[www.testvalley.gov.uk/localplan2040](http://www.testvalley.gov.uk/localplan2040)

Once the form has been completed, please send to [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk) below by **noon on Tuesday 2<sup>nd</sup> April 2024**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

### Contacting us

Planning Policy and Economic Development Service  
Test Valley Borough Council  
Beech Hurst  
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Andover  
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Website: [www.testvalley.gov.uk/localplan2040](http://www.testvalley.gov.uk/localplan2040)

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## Part A: Your Details

Please fill in all boxes marked with an \*

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mr	First Name*	Chris
Surname*	Rees		
Organisation* (If responding on behalf of an organisation)	Alfred Homes Ltd		

Please provide your email address below:

Email Address*	
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Alternatively, if you don't have an email address please provide your postal address.

Address*			
	Postcode		

■ you are an agent or responding on behalf of another party, please give the name/ company/ organisation you are representing:

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### Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/ postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment.

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available on our website here:  
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

## Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

General

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

Paragraph Ref	Specific Comments
<p><b>Policy HOU7</b></p>	<p>It is noted that the Framework requires Local Planning Authorities to provide opportunities for custom and self-build housing, however, the current approach as put forward within Policy HOU7 brings with it inherent problems, particularly at the scale of development proposed.</p> <p>As noted within the Policy, the Borough Council is seeking the provision of 'serviced plots' within strategic sites over 100 dwellings (5% of the total) to be marketed for a period of 24 months. The following summarises the consequences of the Policy, noting that to be justified, a change is required with a suggested revision to the Policy to make it 'sound'.</p> <p><u>Quantum</u></p> <p>While the Policy remains silent on tenure, in reality a strategic site in excess of 100 dwellings will have 40% of the dwellings given over to Affordable Housing, leaving 60% for Open Market, from which the 5% is going to be derived.</p> <p>In reality the 5% would equate to 8.3% when taken from this smaller pool of housing, which is then likely to be rounded up, to 9% of the open market homes not being able to be designed, built and sold by a housebuilder within its development, which is a significant amount.</p> <p>While the Policy stipulates 5%, mathematically, the reality is more like 9% once the affordable housing is removed from the equation.</p> <p>For a scheme of 100 dwellings or close to that quantum, this is a significant amount and one which will have an impact across many facets, which I set out within this representation.</p> <p><u>Masterplanning and Design – Policy DES1</u></p> <p>Policy DES1 seeks to boost contextual analysis and the delivery of schemes that have a sense of place, which requires a comprehensive approach and continuity to design. To achieve this, developments must be planned in a cohesive manner, with each building and its relationship to the next and street scene requiring close attention, particularly in sensitive locations close to Heritage Assets.</p>



While Design Codes can be drafted, in reality no service plot is ever going to achieve the continuity of scale, form and design than a property that has been developed as part of a cohesive design and constructed at the same time, using the same craftsmanship and trades as the other Open Market properties.

Moreso, where there are other material factors at play in respect of the design, scale and massing of the development such as heritage and design matters, the actual scope for 'custom' houses is very narrow, given the need for a cohesive architectural design.

The potential for conflict with Policy DES1 is therefore great, as is the likely dilution of architectural quality and materials to the detriment of place making, particularly as previously noted close to Heritage Assets.

#### Health & Safety

Access to and from construction sites is strictly controlled for obvious Health and Safety reasons, with limitations on movement and a plethora of procedures in place to ensure conformity. Development sites are monitored by the appointed Health & Safety co-ordinator, who reviews the performance of all site operatives periodically.

To have multiple serviced plots within a construction site raises a number of H&S problems in respect of access, movement and monitoring. Any tradesman or 'owner' of the plot could only access the land under the approved protocol of the Health & Safety co-ordinator, and any breach of those protocols leading to injury or worse could have significant consequences for the developer. Post taking ownership of the serviced Plot, how the protocols could be enforced is also questionable.

#### Timing of construction

With regard to timing, it is perfectly feasible to conclude that any self-build or custom build project could extend well beyond the timeline of the construction of the development within which it is located. Given the fragility of personal, one off build projects, it is also not inconceivable that construction of such individual properties can stall for lengthy periods of time leaving a blight on the development as a whole.

Any such delays within an area of the development site where there are occupations also raises very real ongoing Health & Safety and security concerns.

### Valuation

It is noted within the Policy that the serviced plot is to be marketed at a valuation to be agreed with the Local Planning Authority. This in itself raises a number of concerns. Firstly, there is no provision for an arbitrator should there be a disagreement over the valuation; it cannot be the case that the Local Authority who is seeking to provide serviced plots is the judge on how much those plots are sold for.

Any serviced plot within a large development will be required to take an equal share of all of the infrastructure and borrowing costs associated with the development. This will, for a scheme of 100 dwellings for example, mean costs associated with large areas of SUDS and Green Infrastructure, foul and portable water connections, roadways, pedestrian and cycle connections, in addition to the associated costs of delivering 40% affordable housing and any other S.106 payments necessary to make the development acceptable in planning terms.

It is not the case that the residual 51% Open Market properties will carry these costs.

The true cost of a single serviced parcel would not be known until therefore all of the developments associated costs and infrastructure burden is known, let alone the margin required for the developer in order to facilitate such a service plot against the borrowing costs and risks. Achieving a valuation will be a highly complex process.

Given these significant questions, for a developer to not know at the point of planning what value would be attributed to up to circa 9% of its open market floorspace would cause significant problems with the developer's lenders, and of course judging viability in respect of the provisions to be set out within a S.106 Agreement, potentially stalling the planning process.

Any risk associated with the sales profile of a site is also reflected in the rates against which the developer can borrow for construction, further exacerbating the unknown profitability of a development, placing pressure on S.106 matters.

### Changes to Policy HOU7 required

For all of the aforementioned reasons, there are inherent problems with the current approach advocated by Policy HOU7,

In order to be considered 'justified' and an appropriate strategy, the Policy approach must be assessed against the reasonable alternatives, which I have set out.

### Stand alone sites

Traditionally, self-build properties have come forward either as stand alone projects or as part of a small collection of properties within a self-contained site with shared infrastructure. Such developments can promote individuality and offer the potential for a much wider scope of materials and architecture than plots enveloped by much larger housing developments.

Moreover, for all of the Health & Safety and timing problems previously noted, for stand alone sites these are much more controllable.

Such sites are also not burdened by the infrastructure and S.106 costs associated with larger developments, thus making the starting point more affordable to those seeking a self-build or custom product.

A stand alone, or indeed multiple stand alone schemes with an associated LPA Design Code would for all of the points raised provide for a more appropriate reasonable alternative approach.

### The scale of sites

As drafted, the Policy requires developments of only 100 houses to be provided for 5% (or 9% where affordable housing is provided at 40%), which as a percentage is a significant amount.

For developments of that scale, the limitations highlighted within this representation are exacerbated when compared to say larger, strategic scale sites, where the scale affords the ability to decompartmentalise the self-build into a specific area of the site much more easily than smaller sites of circa 100 dwellings. The effect of absorption is also significantly lessened.

Within the Southern and Northern Housing Market Areas, there are only two Sites identified under Policy 6 (SS6) that come close to the bottom of this threshold, being Land South of Andover Road, East Andover – 90 dwellings, and Land South of Bypass Road, South Romsey – 110 dwellings.

As known to the LPA, Alfred Homes is the development partner for the Bypass Road allocation, and therefore has a significant interest in the justification for Policy HOU7, given it is the only Strategic Site that goes over the threshold 100 threshold by a nominal amount, with all other strategic sites comfortably exceeding the threshold.

This raises an interesting mathematical equation, with an allocation of 110 dwellings, and what this would actually mean in practice, which is set out.

As previously noted, the percentage of serviced plots is closer to 9% than 5%, given it only applies to the Open Market properties.

For Bypass road and its allocation of approximately 110 dwellings, triggering the requirement for the serviced plots is only achieved by the 10 additional dwellings over the threshold.

Firstly, these 10 dwellings would attract 40% affordable housing, leaving 6 properties, of which 5 would need to be given over to custom-build/ self-build to comply with the Policy, leaving a single property for Open Market Sale.

Mathematically at least, by applying for 110 dwellings compared to 100 dwellings, Alfred Homes has to provide an extra 4 affordable housing units and 5 serviced plots for the return of a single Open Market property.

On an Open Market to Affordable Housing percentage split, that equates to the provision of 80% affordable homes on the last 10 properties (4 out of 5), with all of the burden, design, architecture and Health & Safety concerns over the serviced plots triggered.

This mathematical reality occurs as the estimated capacity for Bypass Road is so close to the threshold, meaning any triggering of the provision of the 5 serviced plots alongside the 40% affordable housing would bring into question the delivery of these 10 homes, and consequently, under such a scenario that the Local Planning Authority losing importantly 4 affordable housing properties.

What this shows is if standalone sites are not adopted for custom build / self build properties, there needs to be sufficient headroom beyond 100 dwellings, with that threshold re-set to ensure no Strategic Allocation falls just above the threshold, such is the case of Bypass Road.

In examining the other Strategic Site capacities, a threshold of 200 dwellings would provide significant headroom over the threshold for each site in order to apply.

#### Consequences of changes to the Policy

By moving the threshold to not sit just above an allocated capacity for any of the Strategic Sites, would mean the mathematical equation as set out within this statement not coming into play when assessing the package of measures to come forward as part of the planning application.

For Bypass Road, this would mean no question mark over applying for the last 10 dwellings, and thus for the LPA maximising the quantum of affordable housing, in theory 4 houses, delivered within this Strategic allocation.

	<p>This also applies however to Land South of Andover Road, as any potential to exceed the current allocation of 90 dwellings, and thus improve the quantum of affordable housing provided is limited to up to 99 homes, as there is no incentive at all to go beyond.</p> <p>While HOU7 places a burden on Bypass Road with 9 of the last 10 homes being given over to Affordable Housing and Serviced Plots, for Andover Road, it acts as a ceiling to any improvement in the quantum of housing delivered.</p> <p>With a new threshold of 200 dwellings, these limitations on Andover Road and Bypass Road allocations go away, and the best scheme achievable with the maximum affordable housing provision can be forged without the need to have a calculator at hand.</p> <p>I trust the reasoning for the amendment to Policy HOU7 in the context of the strategic allocation at Bypass Road will be considered and progressed in advance of the Regulation 19 draft being published, but should you wish to discuss our concerns, please do contact me at any time.</p>
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Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mr	First Name*	Chris
Surname*	Rees		
Organisation* (If responding on behalf of an organisation)	Alfred Homes Ltd		

Please provide your email address below:

Email Address*	
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Alternatively, if you don't have an email address please provide your postal address.

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<b>Policy SA5</b>	<p>I write to provide our support for the identification of land at Bypass Road, Romsey, for the delivery of approximately 110 dwellings within walking distance of the facilities and services of Romsey Town Centre.</p> <p>As set out within the proposed Spatial Strategy and specifically Para 3.11, support is given to the focus of development being at the principal town of Romsey within Southern Test Valley, linked to promoting its associated regeneration programme.</p> <p>As the principal Town within the south of the Borough, Romsey will continue to have a vital role in the delivery of new homes of all tenures in the most sustainable location with access to services and facilities.</p> <p>To support the Council's chosen route and spatial strategy, Alfred Homes has engaged its consultancy team, led by Adam Architecture, to commence the process of developing a cohesive masterplan and delivery strategy for land south of Bypass Road, known as Palmerston Park, taking into account the opportunities and constraints and they exist.</p> <p>Enclosed within this representation is a Vision Statement, which summarises the initial outputs from this process and to start to visualise how the development will be formed and contribute to the Market Town of Romsey, and in part, meet the housing needs of the Borough.</p> <p>There are no hard constraints to the delivery of the land for approximately 110 dwellings, with a pre-application enquiry having been completed with Hampshire County Council Highways Department, identifying the vehicular and pedestrian access arrangements to the site to accommodate this quantum of housing and movements.</p> <p>Moreover, as set out within the enclosed, Palmerston Park provides a role in a wider context in connecting other land parcels to the south of Romsey, including the Rapids and Whitenap, through to the Town Centre via improved pedestrian and cycle connections.</p>

	<p>As we move forward to the Regulation 19 draft, Alfred Homes and its consultancy team look forward to engaging with the Local Planning Authority and key stakeholders as we progress the Vision in advance of delivering a new inclusive community for Romsey.</p>
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# PALMERSTON PARK

## VISION STATEMENT

LOCAL PLAN REPRESENTATION  
SOUTHERN AREA POLICY 5



ADAM ARCHITECTURE



NA/6260 - April 2024



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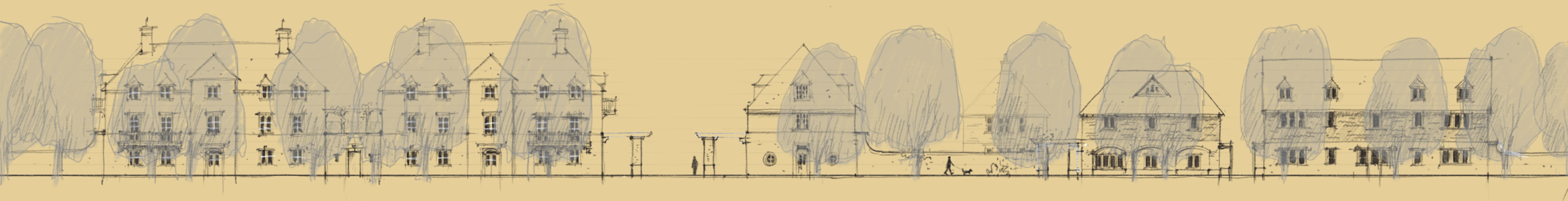
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Artists' impression - Green Lane



# THE VISION

The vision for this key site is to create a new extension to Romsey that is rooted upon the particular architectural and settlement design patterns which together define the special character of this important and distinctive Test Valley Region.

The architectural character of the new development will draw upon local precedent with high quality traditional materials and distinctive design details, in line with the heritage and character assessment, to help reinforce the special character of Romsey. The new development is near the heart of the town and will reinforce the viability of the existing facilities. This will ensure that Romsey remains vibrant for the future.





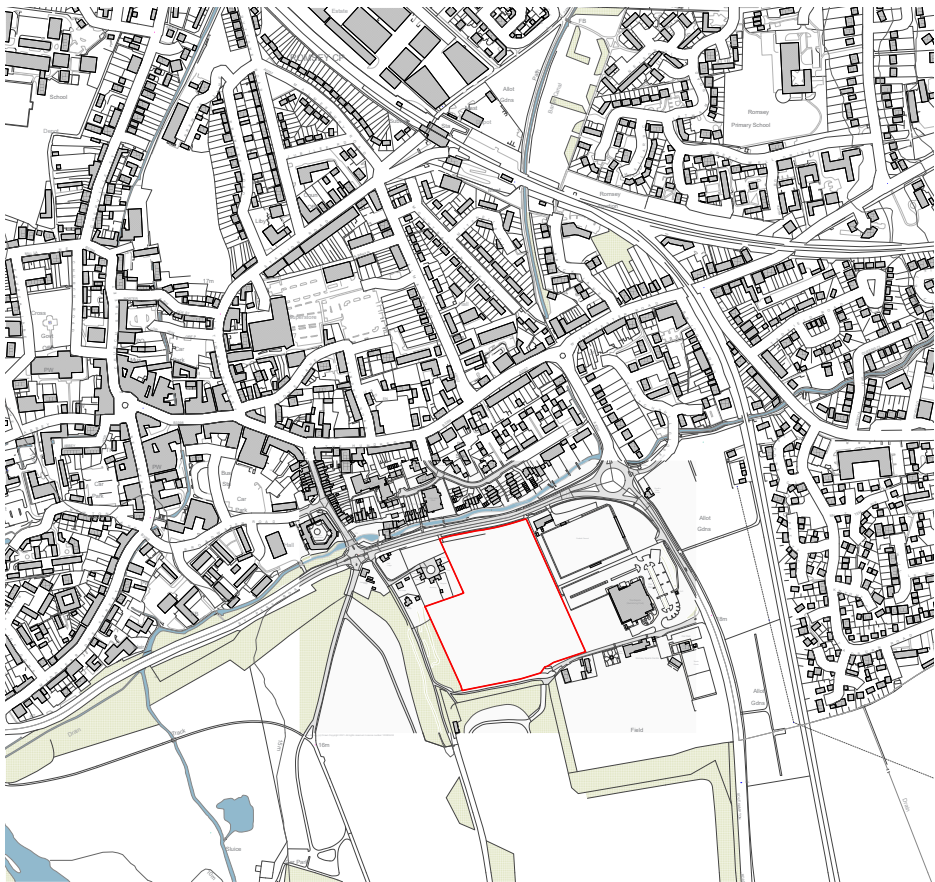
# 2.0 INTRODUCTION

This Vision Statement forms part of Alfred Homes' representation to the Test Valley Borough Council Regulation 18 Part Local Plan Draft.

The site is located outside the historic market town of Romsey in the county of Hampshire. The site lies to the east of the Broadlands Estate, which contains Broadlands, a Grade I listed house.

The site comprises approximately 3.80 hectares (9.39 acres) and is divided into four parcels by post and wire fencing and treed hedgerows.

The site lies on the southern boundary of the town settlement boundary and Conservation Area. The site is also in relatively close proximity to several listed buildings, the setting of which could be affected by an allocation for residential development of the land. These are described in more detail in the Heritage and Character chapter of this document, which inform the assessment and design process.



OS map view: the site in the wider context

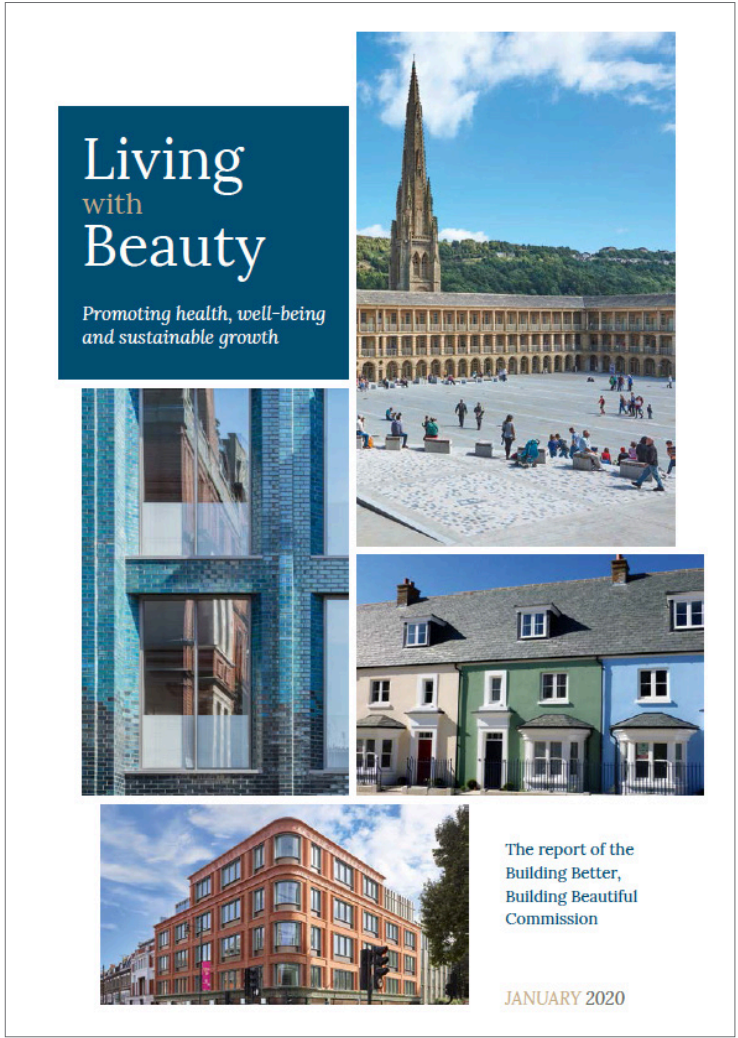


Aerial View



# 2.1 NATIONAL DESIGN GUIDANCE

The team are committed to the delivery of exemplary development and endorse the principles set out in the National Design Guide (NDG) and Building for Healthy Life. ADAM Architecture consistently display leadership in relation to promoting beauty in the built environment with Park View, Woodstock cited in the Cost and Value research by Knight Frank, commission by the Building Better Building Beautiful Commission: (BBBBC), and several of ADAM Architecture's schemes illustrated in Living with Beauty by the BBBBC, the White Paper on Planning and the National Model Design Code.





# 3.0 DESIGN PRINCIPLES

The design of the masterplan for Palmerston Park has been guided by the Heritage Character Analysis together with a clear set of best practice placemaking principles.

<p><b>CHARACTER AND IDENTITY</b></p> <ul style="list-style-type: none"><li>• Respond to and reinforce local distinctive patterns of development, identified in the character analysis appraisal and figure ground study, landscape and culture, whilst generating a unique sense of place.</li><li>• Promote the use of a limited palette of local material and details, identified in the character research to ensure that the development contributes to local character and distinctiveness.</li><li>• Create a series of linked and distinctive urban spaces.</li><li>• Ensure that the scale and mass of the built form makes best use of the land and is in harmony with the surrounding residential character.</li></ul>	<p><b>QUALITY OF THE PUBLIC REALM</b></p> <ul style="list-style-type: none"><li>• Develop all spaces and routes with a high quality hard and soft landscape and ensure that these are attractive, safe and work effectively for all sectors of the community.</li></ul>	<p><b>LEGIBILITY</b></p> <ul style="list-style-type: none"><li>• Promote legibility through the provision of recognisable routes, intersections and landmarks to help people find their way around.</li><li>• Achieve a hierarchy of spaces each with their own distinctive character.</li></ul>	<p><b>DIVERSITY</b></p> <ul style="list-style-type: none"><li>• Provide a wide variety of dwelling types, including a mix of tenure to provide a mixed and balanced community.</li></ul>
<p><b>CONTINUITY AND ENCLOSURE</b></p> <ul style="list-style-type: none"><li>• Promote the continuity of street frontages and enclosure of space found within the town, including the use of new stone walls which are characteristic of the area, to clearly define public and private areas.</li><li>• Ensure that all public space is overlooked by buildings to provide a safe and secure environment.</li></ul>	<p><b>EASE OF MOVEMENT</b></p> <ul style="list-style-type: none"><li>• Promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic.</li><li>• Reduce the dominance of the car through the provision of a mixed parking strategy.</li><li>• Provide calming measures and reduce vehicle speeds within the development.</li></ul>	<p><b>ADAPTABILITY</b></p> <ul style="list-style-type: none"><li>• To provide housing that is robust and adaptable to changing requirements.</li></ul>	<p><b>SUSTAINABILITY</b></p> <ul style="list-style-type: none"><li>• Encourage sustainable living through the layout of the scheme in terms of transport, energy use, water use and use of materials.</li><li>• Enhance the overall value of the development and create positive social, economic and environmental benefits.</li></ul>

# 3.1 DESIGN APPROACH

Our approach to the development is underpinned by a detailed understanding of the site and its built and landscape heritage context. High quality of design is of critical importance as is a strong sense of place. The form of this new town extension will be clear and distinctive drawing inspiration in terms of scale, materials, massing and traditional architectural character and detail preserving the character and appearance of the Historic Romsey.

Its location makes it a natural extension to Romsey providing an opportunity to consolidate the heart of the town and to be contained within its landscape setting.

The masterplan therefore starts with reinforcing the existing natural edge to the settlement and boundary to the south. The existing edges and boundary features of the site are well defined by the treed hedgerows to south and west towards the Broadlands Estate.

To Bypass Road the proposals will strengthen the street frontage with the addition of a new building to the south of the new access whilst maintaining the open aspect to the west.

The development will be permeable and properly connected to the town and the wider surrounding amenities.

Our design is based on the use of perimeter blocks with the forms of the buildings ensuring there is a clear demarcation between the public and private realm. Frontages will be used to provide natural surveillance over streets and public spaces.

The density will respond to the historic character of Romsey.



*Artists' Impression of the elevations surrounding The Square*

# 3.2 SUSTAINABILITY

Alfred Homes are committed to delivering a high quality sustainable development at Palmerston Park. This commitment is formed around energy, materials, nature and living:

- Energy**
  - Careful consideration of plot layout, building design and orientation at planning application stage will increase natural cooling, ventilation and daylight whilst reducing summer over-heating and winter heating demand.
  - All homes will be designed to meet higher standards of energy efficiency, creating buildings that require little energy for heating or cooling.
  - All homes will incorporate low carbon and renewable technologies as appropriate.

- Masterplan and street design to facilitate active travel movements over car trips to support health and wellbeing and reduce transport associated emissions, including pedestrian and cycle routes within the site, and their connections with the surroundings.
  - Electric car charging will be provided.

- A community consultation process will be developed and implemented from early stages.
  - Provision of a mix of types and sizes of homes, including affordable homes.

## Materials

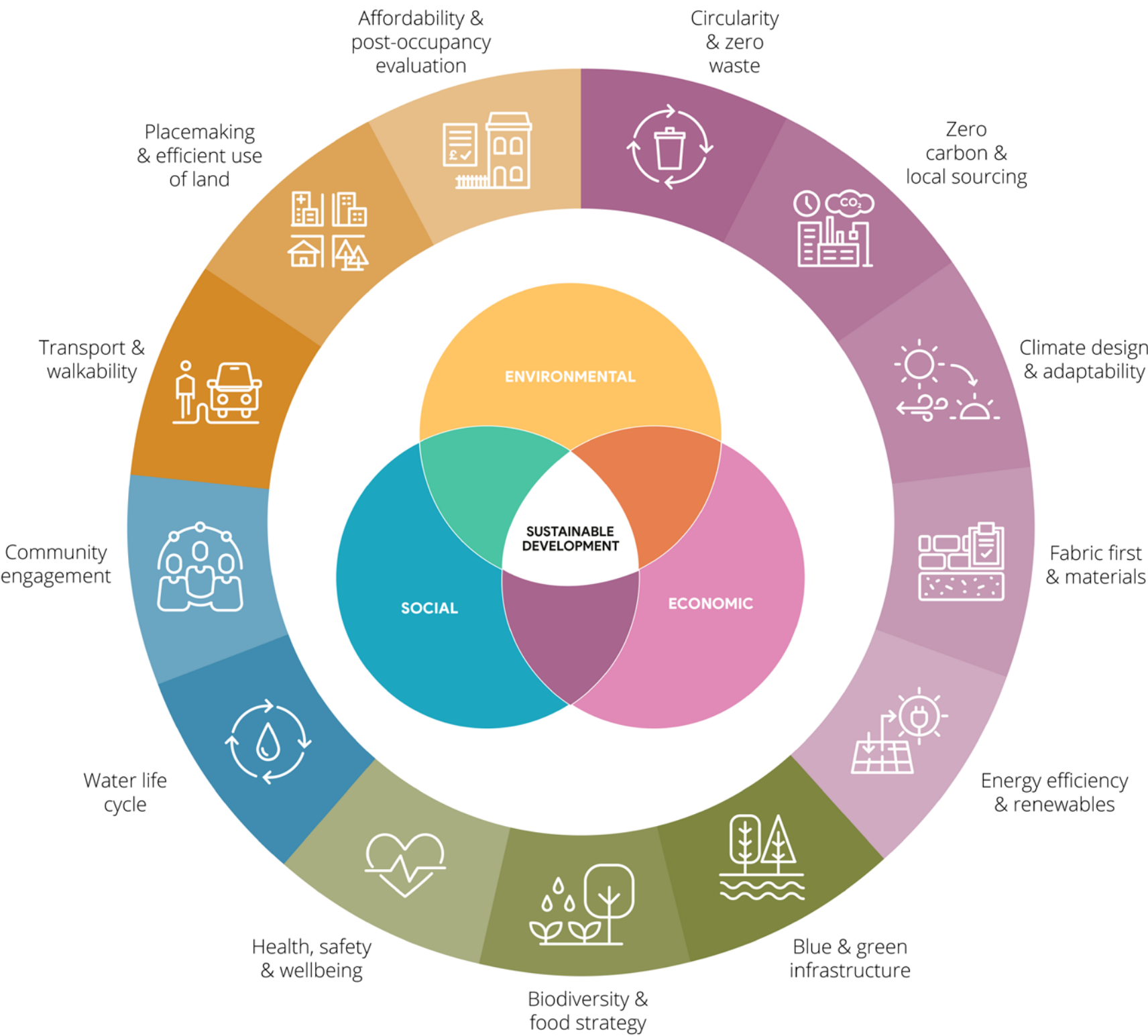
- Use of natural, local and recycled materials will be maximized in the proposed scheme where possible.
- Site-won material will be incorporated in the proposed design where possible to reduce the amount site-won soil to be reused or recycled off-site, in line with circular economy principles.
- Best practice waste management strategies will be incorporated in the masterplan.

## Nature

- Deliver at least 10% net gain in biodiversity, with green infrastructure that includes local priority habitats, providing the multiplicity of additional benefits from nature (wellbeing, shading, flood mitigation etc).
- Ecological masterplan improving habitat connectivity and bringing wildlife into the built form.
- Sustainable drainage systems will not only consider flood risk and drainage, but will incorporate nature-based blue and green infrastructure solutions to support biodiversity, habitat connectivity, wetland creation etc.
- Alfred Homes is committed to considering the approach to the ongoing future stewardship of its sites and maintaining an interest beyond the outline planning applications stage.

## Living

- The development will include a mix of dwelling types, sizes and tenure, focusing on placemaking and social inclusion and targeted at meeting specific local needs promoting a balanced, mixed, vital and vibrant community.



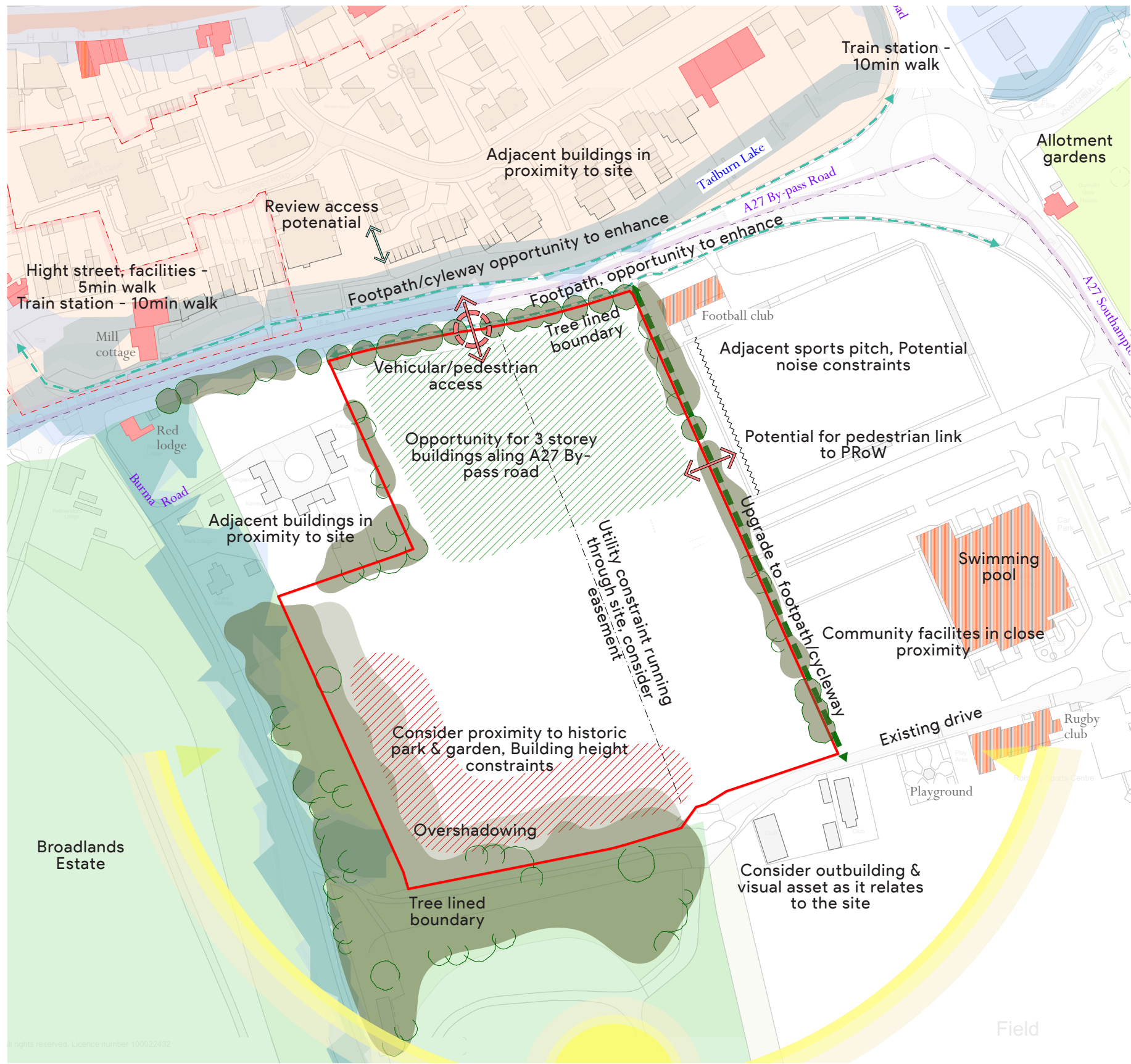


# 3.3 SITE OPPORTUNITIES

This diagram brings together all the site opportunities arising from the analysis studies. It gives a visual understanding of the potential the site has in terms of development and connections.

The opportunity to create a distinctive place that is a natural extension to Romsey through design, spatial arrangement of dwellings, landscape and physical and visual connections.

- Site boundary
- Potential site access
- Street names
- Romsey settlement boundary
- City centre
- High street
- Conservation area boundary
- Listed buildings
- Comercial buildings
- Listed parks and gardens (Broadlands estate)
- Allotment gardens
- Boundary planting and trees
- Flood zone 3
- Flood zone 2
- Path of sun / orientation
- Public Footpath
- 5 min walk radius from By-pass Rd site access
- Utility constraint running through site
- potential noise constraint
- Overshadowing
- Building height constraint
- Opportunity for 3 storey buildings
- Potential upgrade to footpath/cycleway



Site Opportunities



# 3.4 ILLUSTRATIVE MASTERPLAN



Entrance to the site

Retained and enhanced existing tree avenue along Bypass Road

New pedestrian/cycle path

Main street with potential cycle provision

Buildings clustered around a central parking square and green spaces

Mews with a mix of smaller homes and parking

The Square for neighbourhood gatherings

Secondary street looping around the residential development

Indicative location of play area

Linear green open space with homes fronting upon it

Loosely set village character residential development

SuDS basins located within the greens

Existing woodland edge

Potential access to adjacent parcel and connections to PRow

Informal parking courts with vistas and terminating views

Linear open space along the edge consisting of retained and enhanced trees and hedge belt

Localised widening along the main street

The green edge with homes fronting upon it

Potential pedestrian/cycle connection

Illustrative Masterplan



# THANK YOU

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